

DECLARATION OF DOLORES Y. LEAL

I, Dolores Y. Leal, declare as follows:

1. I am an attorney licensed to practice law in California. I am a partner with the law firm Allred, Maroko & Goldberg, counsel of record for Plaintiff Mark Snookal. I have personal knowledge of the facts set forth below and, if called as a witness, could and would testify competently to such facts under oath.

2. I took the deposition of Andrew Powers on September 17, 2024, and I am in possession of a certified copy of his deposition transcript. Attached hereto as **Exhibit 14** is a true and correct copy of relevant excerpts from Mr. Powers's deposition transcript. During his deposition, Mr. Powers authenticated a number of documents including those that were marked as Exhibits 3, 5, and 12 which are each referenced in the concurrently filed Joint Brief re Motion for Summary Judgment and Statement of Uncontroverted Facts and Genuine Disputes. Those documents are attached hereto as **Exhibits 14-3, 14-5, and 14-12:**

Exhibit 14-3: September 4, 2019 Email from Mark Snookal to Human Resources Manager Andrew Powers

Exhibit 14-5: Andrew Powers Email to Mark Snookal Re: Medical Team Findings

Exhibit 14-12: Email from Andrew Powers to medical team in Nigeria

3. I took the deposition of Dr. Eshiofe Asekomeh on October 10, 2024, and I am in possession of a certified copy of his deposition transcript. Attached hereto as **Exhibit 15** is a true and correct copy of relevant excerpts from Dr. Asekomeh's deposition transcript. During his deposition, Dr. Asekomeh authenticated a number of documents including those that were marked as Exhibits 2 and 7 which are each referenced in the concurrently filed Joint Brief re Motion for Summary Judgment and Statement of Uncontroverted Facts and Genuine

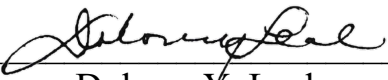
1 Disputes. Those documents are attached hereto as Exhibits 15-2 and 15-7:

2 **Exhibit 15-2:** Job Description for NMA EGTL Reliability
3 Engineering Manager

4 **Exhibit 15-7:** Dr. Asekomeh email thread with Nigerian cardiologists
5 regarding Mark Snookal's medical report

6 4. I took the deposition of Thalia Tse on September 13, 2024, and I am in
7 possession of a certified copy of her deposition transcript. Attached hereto as
8 **Exhibit 16** is a true and correct copy of relevant excerpts from Ms. Tse's
9 deposition transcript.

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11 I declare under penalty of perjury under the laws of the State of California
12 that the foregoing is true and correct, and that this Declaration was executed on
13 October 17, 2024, at Los Angeles, California.

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16 Dolores Y. Leal